


SO ORDERED.

**HAUSFELD**

April 18, 2025

  
**JENNIFER L. ROCHON**  
United States District Judge

33 Whitehall Street  
14th Floor  
New York, NY 10004

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 20B  
New York, NY 10007

The Court will GRANT the request to modify the briefing schedule as set forth below, and extends the deadline for Plaintiffs to file the Consolidated Complaint to May 30, 2025.

Date: April 18, 2025  
New York, New York

**RE: *In re RetailMeNot Browser Extension Litigation*, No. 1:25-cv-00783-JLR  
Joint Motion for Extension of Time to File Consolidated Complaint**

Dear Judge Rochon,

Plaintiffs Edgar Oganessian, Matthew Ely, Tessa Rhodes, Just Josh, Inc., and Shonna Coleman (“Plaintiffs”) and Defendants RetailMeNot, Inc. and Ziff Davis Inc. (“Defendants”) (together, the “Parties”), respectfully submit this letter pursuant to Rule 1.F of the Court’s Individual Rules of Practice in Civil Cases, to jointly request an extension of time for Plaintiffs to file their Consolidated Complaint and to modify the associated briefing schedule.

On March 13, 2025, the Court issued an Order directing the Parties to submit a stipulation with a proposed deadline for the filing of a Consolidated Complaint and a proposed schedule for Defendants to answer or otherwise respond to the Consolidated Complaint. *See* Dkt. 25. The Parties filed a Stipulation and [Proposed] Order for the Court’s approval on March 20, 2025. Dkt. 28. The Court entered the Stipulation on March 21, 2025 (Dkt. 29), setting the following schedule:

- Plaintiffs’ Consolidated Complaint to be filed no later than May 5, 2025;
- Defendants’ Motion to Dismiss to be filed no later than June 19, 2025;
- Plaintiffs’ Opposition to be filed no later than July 21, 2025;
- Defendants’ Reply to be filed no later than August 5, 2025.

Due to the travel schedules and other professional obligations of counsel for both Parties, the Parties jointly request a brief extension of the current deadline to file the Consolidated Complaint and corresponding modification of the briefing schedule as follows:

- Plaintiffs’ Consolidated Complaint to be filed no later than **May 30, 2025**;
- Defendants’ Motion to Dismiss to be filed no later than **July 25, 2025**;
- Plaintiffs’ Opposition to be filed no later than **August 29, 2025**;
- Defendants’ Reply to be filed no later than **September 26, 2025**.

The requested extension will not prejudice any party and is sought in good faith to accommodate logistical constraints related to trial and briefing calendars and upcoming travel.

This is the first request for an extension of any deadline in this consolidated action, and all Parties agree and stipulate to the relief requested herein.

Respectfully,

/s/ Julian Hammond

Julian Hammond (*pro hac vice*)

**HAMMONDLAW, P.C.**

1201 Pacific Ave., 6th Floor

Tacoma, WA 98402

T: (310) 601-6766

E: jhammond@hammondlawpc.com

/s/ Thomas E. Loeser

Thomas E. Loeser (*pro hac vice* forthcoming)

**COTCHETT PITRE & MCCARTHY LLP**

1809 7th Avenue, Suite 1610

Seattle, WA 98101

T: (206) 970-8181

E: tloeser@cpmlegal.com.com

/s/ Ashley M. Crooks

Ashley M. Crooks (N.Y. Bar No. 5800776)

**HAUSFELD LLP**

33 Whitehall Street, 14th Floor

New York, NY 10004

T: (646) 357-1100

E: acrooks@hausfeld.com

***Interim Co-Lead Counsel for Plaintiffs***

/s/ Mark David McPherson

Mark David McPherson

**GOODWIN PROCTER LLP**

The New York Times Building

620 Eighth Avenue

New York, NY 10018

T: (212) 813-8800

E: mmcpherson@goodwinlaw.com

***Counsel for Defendants***